

¶ Ex. 6

DUANE MORRIS LLP
A Delaware Limited Liability Partnership
By: Ryan A. Gower (312980)
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: 215.979.1000
Facsimile: 215.979.1020
E-mail: rgower@duanemorris.com

PROTHONOTARY
FILED AND INDEXED
10 NOV 2022 08:48 am
A. STAMATO
COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

v.

ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

NO. _____

STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

CIVIL ACTION

MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Defendants.

To: ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

Date: November 10, 2022

NOTICE UNDER RULE 2958.1 OF JUDGMENT AND EXECUTION THEREON
IMPORTANT NOTICE

A JUDGMENT IN THE AMOUNT OF \$64,518.33 HAS BEEN ENTERED AGAINST YOU AND IN FAVOR OF THE PLAINTIFF WITHOUT ANY PRIOR NOTICE OR HEARING BASED ON A CONFESSION OF JUDGMENT CONTAINED IN A WRITTEN AGREEMENT OR OTHER PAPER ALLEGEDLY SIGNED BY YOU. THE SHERIFF MAY TAKE YOUR MONEY OR OTHER PROPERTY TO PAY THE JUDGMENT AT ANY TIME AFTER THIRTY (30) DAYS AFTER THE DATE ON WHICH THIS NOTICE IS SERVED ON YOU.

YOU MAY HAVE LEGAL RIGHTS TO DEFEAT THE JUDGMENT OR TO PREVENT YOUR MONEY OR PROPERTY FROM BEING TAKEN. YOU MUST FILE A PETITION SEEKING RELIEF FROM THE JUDGMENT AND PRESENT IT TO A JUDGE WITHIN THIRTY (30) DAYS AFTER THE DATE ON WHICH THIS NOTICE IS SERVED ON YOU OR YOU MAY LOSE YOUR RIGHTS.

YOU SHOULD TAKE THIS NOTICE TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**Philadelphia Bar Association
Lawyer Referral and Information Service
One Reading Center
Philadelphia, PA 19107
Telephone: 215-238-1701**

**Asociacion De Licenciados De Filadelfia
Servicio De Referencia E Informacion Legal
One Reading Center
Filadelfia, PA 19107
Telefono: 215-238-1701**

DUANE MORRIS LLP

Dated: November 10, 2022

/s/ Ryan A. Gower
By: Ryan A. Gower (312980)
Attorneys for Plaintiff Hard Money PA LLC

**I AM ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED
WILL BE USED FOR THAT PURPOSE. I AM A DEBT COLLECTOR**

DUANE MORRIS LLP
A Delaware Limited Liability Partnership
By: Ryan A. Gower (312980)
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: 215.979.1000
Facsimile: 215.979.1020
E-mail: rgower@duanemorris.com

Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

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MILDRED S. ST. FORT
6774 Woodcrest Ave.
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Defendants.

NO. _____

CIVIL ACTION

To: STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

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DUANE MORRIS LLP

Dated: November 10, 2022

/s/ Ryan A. Gower
By: Ryan A. Gower (312980)
Attorneys for Plaintiff Hard Money PA LLC

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Attorneys for Plaintiff Hard Money PA LLC

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COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

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MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

CIVIL ACTION

Defendants.

To: MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Date: November 10, 2022

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Dated: November 10, 2022

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Attorneys for Plaintiff Hard Money PA LLC

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COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

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Philadelphia, PA 19151

Defendants.

CIVIL ACTION

To: ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

Date: November 10 2022

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a JUDGMENT BY CONFESSION has been entered against you in the above proceeding and that enclosed herewith is a copy of all documents filed in support of the said judgment.

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE
CONTACT: Ryan A. Gower, at the following telephone number: (215) 979-1586.

OFFICE OF JUDICIAL RECORDS

DUANE MORRIS LLP
A Delaware Limited Liability Partnership
By: Ryan A. Gower (312980)
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: 215.979.1000
Facsimile: 215.979.1020
E-mail: rgower@duanemorris.com

Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

v.

ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

NO. _____

STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Defendants.

CIVIL ACTION

To: STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

Date: November 10, 2022

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Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

v.

ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

NO. _____

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6774 Woodcrest Ave.
Philadelphia, PA 19151

MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Defendants.

CIVIL ACTION

To: MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Date: November 10, 2022

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Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

v.

ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

NO. _____

STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

CIVIL ACTION

Defendants.

COMPLAINT IN CONFESSION OF JUDGMENT
WITH AVERMENT OF MORTGAGE

Plaintiff, Hard Money PA LLC by and through its attorneys, Duane Morris LLP, complaining of the Defendants herein, alleges as follows:

1. Plaintiff, Hard Money PA LLC ("Plaintiff"), is a limited liability company registered to conduct business in the Commonwealth of Pennsylvania, with a business address at 10015 Old Columbia Road, Suite H-125, Columbia, Maryland 21046.

2. Defendant Erion Real Estate Investors, LLC (“Defendant”) is a Pennsylvania limited liability company with an address of 519 N. Wanamaker Street, Philadelphia, PA 19131.

3. Defendant Stephen Augustus Duffus-Doyle is an adult individual with an address of 6774 Woodcrest Ave., Philadelphia, PA 19151.

4. Defendant Mildred S. St Fort is an adult individual with an address of 6774 Woodcrest Ave., Philadelphia, PA 19151.

5. Defendant Erion Real Estate Investors, LLC is the real owner of the premises hereinafter described by virtue of a deed dated January 21, 2019 and recorded on January 28, 2019 in the Office of the Commissioner of Records of the City of Philadelphia as Document ID: 53470588 (the “Deed”). A true and correct copy of the Deed is attached hereto, made a part hereof, and is marked as **Exhibit “A.”**

6. On or about November 8, 2021, Hard Money PA LLC entered into a loan agreement with Defendant Erion Real Estate Investors, LLC (“Borrower”) whereby Hard Money PA LLC lent to Borrower the principal amount of \$50,000.00 (the “Loan”). The Loan was evidenced by a promissory note (the “Note”) dated November 8, 2021, executed by Borrower, and delivered to Hard Money PA LLC. The Note bears a fixed interest rate of 13% per annum, payable by twelve (12) interest only payment of \$541.67 commencing on February 21, 2021 and one (1) final balloon payment on or before December 1, 2022 (the “Maturity Date”), at which time, unless sooner paid, the entire balance, together with accrued but unpaid interest thereon, and any costs, fees, premiums and expenses due under the Note, shall be due and payable. The Note further provides that immediately upon an event of default, interest under the Note shall accrue on the unpaid principal balance from the earlier of the due date of the first unpaid monthly installment or the occurrence of such event of default, as applicable, at the default

interest rate of 24%. A true and correct copy of the Note is attached hereto, made a part hereof, and is marked as **Exhibit “B.”**

7. To secure the obligations under the Note, Borrower executed and delivered to Hard Money PA LLC an open-ended non-purchase money mortgage (the “Mortgage”), dated November 9, 2021 and recorded on January 14, 2022 in the Office of the Commissioner of Records of the City of Philadelphia as Document ID: 53944576. A true and correct copy of the Mortgage is attached hereto, made a part hereof, and is marked as **Exhibit “C.”**

8. The Mortgage secures the following real property (hereinafter, the “Mortgaged Premises”): 519 N. Wanamaker Street, Philadelphia, PA 19131. The Mortgaged Premises are further described in the schedule attached hereto as **Exhibit “D”** and made a part hereof, said schedule being the same attached to and recorded with the Mortgage.

9. To further secure the amounts loaned pursuant to the Note, Defendants, Stephen Augustus Duffus-Doyle and Mildred S. St Fort (“Guarantors”), executed and delivered to Plaintiff an Unlimited Continuing Guaranty (the “Guaranty”) dated November 9, 2022 whereby Guarantors absolutely and unconditionally guaranteed to Plaintiff the prompt and full payment and performance of the Note, and the due and punctual performance and observance by Borrower of any other terms, covenants and conditions of the Note and Mortgage. A true and correct copy of the Guaranty is attached hereto, made a part hereof, and is marked as **Exhibit “E.”**

10. Defendant, or the grantee or grantees, if any, of said Defendant, is in default because the payments required by the Note and Mortgage have not been made as set forth below, and by their terms, upon breach and failure to cure said breach after notice, all sums secured by

the Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

11. The following amounts are due as of August 10, 2022:

| | |
|---|-----------------|
| Principal Balance | \$50,000.00 |
| Accrued Interest (at a rate of 24% as of 08/10/2022) | \$ 6,333.33 |
| Late Charges | \$ 600.00 |
| Attorney Collection Fee | \$ 7,500.00 |
| NSF Collection Charge | \$ 50.00 |
| Wire Fee | <u>\$ 35.00</u> |
| TOTAL as of 08/10/2022 | \$64,518.33 |

Interest continues to accrue on account of the Loan from and after August 11, 2022, at the *per diem* rate of \$33.33.

12. The warrant of attorney in the Note authorizes the entry of judgment against Defendant Erion Real Estate Investors, LLC for all sums due to Hard Money PA LLC including those evidenced by the Note.

13. The warrant of attorney in the Guaranty authorizes the entry of judgment against Defendants, Stephen Augustus Duffus-Doyle and Mildred S. St Fort, for all sums due to Hard Money PA LLC including those evidenced by the Note.

14. The Note has not been assigned, and Hard Money PA LLC is the current holder thereof.

15. Judgment has not been entered pursuant to the warrant of attorney contained in the Note or the Guaranty in this or any other jurisdiction.

16. This judgment is not being entered by confession against any natural person in connection with a consumer credit transaction.

17. No conditions precedent to the entry of judgment against the Defendants remain unperformed.
18. The warrant of attorney in the Note is less than twenty (20) years old.
19. The warrant of attorney in the Guaranty is less than twenty (20) years old.
20. The provisions of 41 P.S. §§ 101 *et. seq.* are not applicable to this action because, among other things, the Loan was made for a “business purpose” and/or is not otherwise within the scope of that statute.
21. The provisions of 35 P.S. §§ 1680.401c, *et. seq.* are not applicable to this action, because among other things, the property securing the Loan is not a one or two family owner occupied residence and/or the Loan is not otherwise within the scope of that statute.

WHEREFORE, Hard Money PA LLC respectfully requests the entry of judgment in its favor and against Defendants, Erion Real Estate Investors, LLC, Stephen Augustus Duffus-Doyle and Mildred S. St Fort, in the amount of \$64,518.33, plus interest from and after August 11, 2022 at the *per diem* rate of \$33.33 costs.

DUANE MORRIS LLP

Dated: November 10, 2022

/s/ Ryan A. Gower
By: Ryan A. Gower (312980)
Attorneys for Plaintiff Hard Money PA LLC

DUANE MORRIS LLP
A Delaware Limited Liability Partnership
By: Ryan A. Gower (312980)
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: 215.979.1000
Facsimile: 215.979.1020
E-mail: rgower@duanemorris.com

Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

v.

ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

NO. _____

STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

CIVIL ACTION

MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Defendants.

AND NOW, to wit this _____ day of _____, 2022, a Complaint in
Confession of Judgment with Averment of Mortgage, and supporting affidavits having been
filed;

JUDGMENT IS HEREBY ENTERED in favor of Plaintiff Hard Money PA LLC and
against Defendants Erion Real Estate Investors, LLC, Stephen Augustus Duffus-Doyle and
Mildred S. St Fort in the amount of \$64,518.33, plus interest from and after August 11, 2022 at
the *per diem* rate of \$33.33, and costs.

THE OFFICE OF JUDICIAL RECORDS

Case ID: 221101165

DUANE MORRIS LLP
A Delaware Limited Liability Partnership
By: Ryan A. Gower (312980)
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Philadelphia, PA 19103-4196
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Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

Plaintiff,

v.

ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

NO. _____

CIVIL ACTION

AFFIDAVIT

STATE OF MARYLAND :
: SS.
COUNTY OF HOWARD :

Christopher Haddon, being first duly sworn upon his oath according to law, deposes and says:

1. I am a Principal of Hard Money PA LLC the Plaintiff herein, and I am authorized to make this affidavit on its behalf.

2. The instruments attached as exhibits (the "Instruments") to the Complaint in Confession of Judgment with Averment of Mortgage filed in this matter are true and correct copies of the original Instruments.

3. Defendants are in default of their obligations under the Instruments, as more fully set forth in the Complaint in Confession of Judgment with Averment of Mortgage.

4. By reason of Defendants' default under the aforementioned Instruments, the following amounts are due as of August 10, 2022:

| | |
|---|-----------------|
| Principal Balance | \$50,000.00 |
| Accrued Interest (at a rate of 24% as of 08/10/2022) | \$ 6,333.33 |
| Late Charges | \$ 600.00 |
| Attorney Collection Fee | \$ 7,500.00 |
| NSF Collection Charge | \$ 50.00 |
| Wire Fee | <u>\$ 35.00</u> |
| TOTAL as of 08/10/2022 | \$64,518.33 |

Interest continues to accrue on account of the Loan from and after August 11, 2022, at the *per diem* rate of \$33.33.

5. The allegations contained in the Complaint in Confession of Judgment with Averment of Mortgage are true and correct to the best of my knowledge, information and belief.



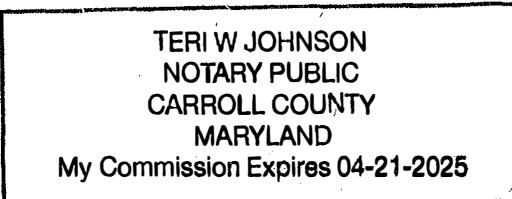
Christopher Haddon

SWORN TO and SUBSCRIBED

before me this 8 day
of November, 2022.



NOTARY PUBLIC
My Commission Expires: 4/21/25



DUANE MORRIS LLP
A Delaware Limited Liability Partnership
By: Ryan A. Gower (312980)
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Attorneys for Plaintiff Hard Money PA LLC

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Plaintiff,

v.

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MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

NO. _____

CIVIL ACTION

AFFIDAVIT OF ADDRESSES AND NON-MILITARY SERVICE

STATE OF MARYLAND :
: SS.
COUNTY OF HOWARD :

Christopher Haddon, being first duly sworn upon his oath according to law, deposes and says:

1. I am a Principal of Hard Money PA LLC the Plaintiff herein, and I am authorized to make this affidavit on its behalf.

2. The Plaintiff's address is 10015 Old Columbia Road, Suite H-125, Columbia, MD 21046.

3. The last-known mailing address of Defendant Erion Real Estate Investors, LLC is 519 N. Wanamaker Street, Philadelphia, PA 19131.

4. The last-known mailing address of Defendant Stephen Augustus Duffus-Doyle is 6774 Woodcrest Ave., Philadelphia, PA 19151.

5. The last-known mailing address of Defendant Mildred S. St. Fort is 6774 Woodcrest Ave., Philadelphia, PA 19151.

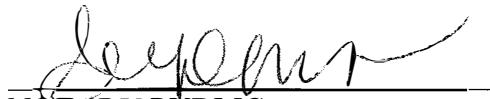
6. Inquiry has been made with the Department of Defense and it has been determined that Defendants, Erion Real Estate Investors, LLC, Stephen Augustus Duffus-Doyle and Mildred S. St Fort, do not fall within the provisions of the Service members Civil Relief Act of 2003, 50 U.S.C. App. § 501.



Christopher Haddon

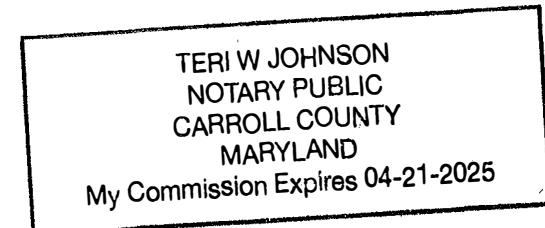
SWORN TO and SUBSCRIBED

before me this 8 day
of November, 2022.



NOTARY PUBLIC

My Commission Expires: 4/21/25



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A Delaware Limited Liability Partnership
By: Ryan A. Gower (312980)
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Attorneys for Plaintiff Hard Money PA LLC

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Plaintiff,

v.

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MILDRED S. ST. FORT
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Philadelphia, PA 19151

Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

NO. _____

CIVIL ACTION

AFFIDAVIT OF LENDER

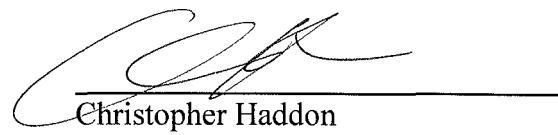
STATE OF MARYLAND :
: SS.
COUNTY OF HOWARD :

Christopher Haddon, being first duly sworn upon his oath according to law, deposes and says:

1. I am a Principal of Hard Money PA LLC the Plaintiff herein, and I am authorized to make this affidavit on its behalf.

2. This is not an action by a seller, holder or assignee arising out of a retail
installment sale, contract or account.

3. The underlying transaction was not a consumer credit transaction, as defined by
Pa.R.Civ.P. 2950.



Christopher Haddon

SWORN TO and SUBSCRIBED

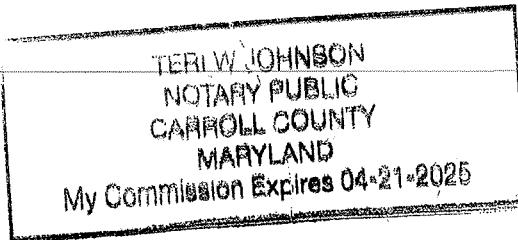
before me this 8 day
of November, 2022.



NOTARY PUBLIC

My Commission Expires:

04-21-25



DUANE MORRIS LLP
A Delaware Limited Liability Partnership
By: Ryan A. Gower (312980)
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: 215.979.1000
Facsimile: 215.979.1020
E-mail: rgower@duanemorris.com

Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

Plaintiff,

v.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

NO. _____

ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Defendants.

CIVIL ACTION

AFFIDAVIT OF BUSINESS TRANSACTION

STATE OF MARYLAND :
COUNTY OF HOWARD : SS.

Christopher Haddon, being first duly sworn upon his oath according to law, deposes and says:

1. I am a Principal of Hard Money PA LLC the Plaintiff herein, and I am authorized to make this affidavit on its behalf.

2. The transaction represented by the Instruments attached to the Complaint in Confession of Judgment with Averment of Mortgage filed in this matter was a business transaction and was not entered into for personal, family or household purposes.



Christopher Haddon

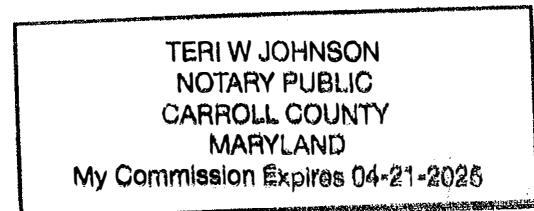
SWORN TO and SUBSCRIBED

before me this 8th day

of November, 2022.



Notary Public
My Commission Expires: 4/21/25



DUANE MORRIS LLP
A Delaware Limited Liability Partnership
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Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,
v.

NO. _____

ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

Defendants.

CIVIL ACTION

ENTRY OF APPEARANCE TO CONFESS JUDGMENT

TO THE OFFICE OF JUDICIAL RECORDS:

Pursuant to the authority contained in the Warrant of Attorney set forth in the Instrument attached as **Exhibits “B” and “E”** to the Complaint in Confession of Judgment with Averment of Mortgage filed in this action, I appear for Defendants Erion Real Estate Investors, LLC, Stephen Augustus Duffus-Doyle and Mildred S. St Fort, and confess judgment in favor of the Plaintiff, Hard Money PA LLC, and against Defendants, Erion Real Estate Investors, LLC,

Stephen Augustus Duffus-Doyle and Mildred S. St Fort, in the amount of \$64,518.33, plus interest from and after August 11, 2022 at the *per diem* rate of \$33.33, and costs.

DUANE MORRIS LLP

Dated: November 10, 2022

/s/ Ryan A. Gower
By: Ryan A. Gower (312980)
Attorneys for Plaintiff Hard Money PA LLC

DUANE MORRIS LLP
A Delaware Limited Liability Partnership
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Facsimile: 215.979.1020
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Attorneys for Plaintiff Hard Money PA LLC

HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
Columbia, MD 21046

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

v.

ERION REAL ESTATE INVESTORS, LLC
519 N. Wanamaker Street
Philadelphia, PA 19131

NO. _____

STEPHEN AUGUSTUS DUFFUS-DOYLE
6774 Woodcrest Ave.
Philadelphia, PA 19151

MILDRED S. ST. FORT
6774 Woodcrest Ave.
Philadelphia, PA 19151

CIVIL ACTION

Defendants.

**PRAECIPE FOR ENTRY OF JUDGMENT BY CONFESSION
AND FOR ASSESSMENT OF DAMAGES**

TO THE OFFICE OF JUDICIAL RECORDS:

Kindly enter judgment by confession in the above-entitled action and assess damages in favor of the Plaintiff, Hard Money PA LLC and against Defendants, Erion Real Estate Investors, LLC, Stephen Augustus Duffus-Doyle and Mildred S. St Fort, in the amount of \$64,518.33, plus interest from and after August 11, 2022 at the *per diem* rate of \$33.33, and costs.

The following amounts are due as of August 10, 2022:

| | |
|------------------------------------|-----------------|
| Principal Balance | \$50,000.00 |
| Accrued Interest (at a rate of 24% | |
| as of 08/10/2022) | \$ 6,333.33 |
| Late Charges | \$ 600.00 |
| Attorney Collection Fee | \$ 7,500.00 |
| NSF Collection Charge | \$ 50.00 |
| Wire Fee | <u>\$ 35.00</u> |
| TOTAL as of 08/10/2022 | \$64,518.33 |

Interest continues to accrue on account of the Loan from and after August 11, 2022, at the *per diem* rate of \$33.33.

DUANE MORRIS LLP

Dated: November 10, 2022

/s/ Ryan A. Gower
By: Ryan A. Gower (312980)
Attorneys for Plaintiff Hard Money PA LLC

DUANE MORRIS LLP
A Delaware Limited Liability Partnership
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HARD MONEY PA LLC
10015 Old Columbia Road, Ste. H-125
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Plaintiff,

v.

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Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

NO. _____

CIVIL ACTION

NOTICE PURSUANT TO 42 PA C.S.A. §2737.1

TO THE DEFENDANTS:

If you have been incorrectly identified in the attached pleading or if there exists any other legal basis to have the judgment evidenced by the attached documents stricken, you may petition the court to strike the confession of judgment pursuant to Pennsylvania Rules of Civil Procedure 206.1 through 206.7 and 2959. A copy of Rule 2959, which relates to striking or opening a judgment, is attached hereto. The petition must be filed with the Philadelphia County Court of

Common Pleas located in Philadelphia, Pennsylvania. The filing procedures for the Philadelphia County Court of Common Pleas are governed by the Philadelphia County Local Rules of Civil Procedure. In the event you are incorrectly identified in this action and you obtain an order striking the judgment, you will be entitled to recover the costs and reasonable attorney's fees incurred by you in securing the order.

DUANE MORRIS LLP

Dated: November 10, 2022

/s/ Ryan A. Gower
By: Ryan A. Gower (312980)
Attorneys for Plaintiff Hard Money PA LLC

Rule 2959. Striking off or Opening Judgment. Pleadings. Procedure.

(a)(1) Relief from a judgment by confession shall be sought by petition. Except as provided in subparagraph (2), all grounds for relief whether to strike off the judgment or to open it must be asserted in a single petition. The petition may be filed in the county in which the judgment was originally entered, in any county to which the judgment has been transferred or in any other county in which the sheriff has received a writ of execution directed to the sheriff to enforce the judgment.

(2) The ground that the waiver of the due process rights of notice and hearing was not voluntary, intelligent and knowing shall be raised only

- (i) in support of a further request for a stay of execution where the court has not stayed execution despite the timely filing of a petition for relief from the judgment and the presentation of *prima facie* evidence of a defense; and
- (ii) as provided by Rule 2958.3 or Rule 2973.3.

(3) If written notice is served upon the petitioner pursuant to Rule 2956.1(c)(2) or Rule 2973.1(c), the petition shall be filed within thirty days after such service. Unless the defendant can demonstrate that there were compelling reasons for the delay, a petition not timely filed shall be denied.

(b) If the petition states *prima facie* grounds for relief the court shall issue a rule to show cause and may grant a stay of proceedings. After being served with a copy of the petition the plaintiff shall file an answer on or before the return day of the rule. The return day of the rule shall be fixed by the court by local rule or special order.

(c) A party waives all defenses and objections which are not included in the petition or answer.

(d) The petition and the rule to show cause and the answer shall be served as provided in Rule 440.

(e) The court shall dispose of the rule on petition and answer, and on any testimony, depositions, admissions and other evidence. The court for cause shown may stay proceedings on the petition insofar as it seeks to open the judgment pending disposition of the application to strike off the judgment. If evidence is produced which in a jury trial would require the issues to be submitted to the jury the court shall open the judgment.

(f) The lien of the judgment or of any levy or attachment shall be preserved while the proceedings to strike off or open the judgment are pending.

DUANE MORRIS LLP

Dated: November 10, 2022

/s/ Ryan A. Gower
By: Ryan A. Gower (312980)
Attorneys for Plaintiff Hard Money PA LLC

VERIFICATION

The undersigned, hereby states that I am a Principal of Hard Money PA LLC, the Plaintiff in this matter, and am authorized to make this Verification because of the exigencies regarding this matter. The statements of fact set forth in the foregoing Complaint in Confession of Judgment with Averment of Mortgage are true and correct to the best of my knowledge information and belief and the source of the information is public records and reports of Plaintiff's agents. The undersigned understands that statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: 11/8/22



Name: Christopher Haddon
Title: Principal

File No.: G8382-00018

Borrower(s): Erion Real Estate Investors, LLC

DUANE MORRIS LLP
A Delaware Limited Liability Partnership
By: Ryan A. Gower (312980)
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: 215.979.1000
Facsimile: 215.979.1020
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Attorneys for Plaintiff Hard Money PA LLC

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COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

Plaintiff,

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Defendants.

NO. _____

CIVIL ACTION

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

DUANE MORRIS LLP

Dated: November 10, 2022

/s/ Ryan A. Gower
By: Ryan A. Gower (312980)
Attorneys for Plaintiff Hard Money PA LLC

Case ID: 221101165